

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

Myint Kyaw a/k/a Jeffrey Wu,

Case No. 820-72407-A736

Debtor.

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Harary Group, LLC,

Adv. Proc. No. 820-08162-A736

Plaintiff,

Answer

- against -

Myint Kyaw a/k/a Jeffrey Wu,

Defendant.

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Defendant Myint Kyaw a/k/a Jeffrey Wu, by his attorneys, Weinberg, Gross & Pergament LLP, as and for his Answer to the Complaint responds as follows:

1. Denies each and every allegation contained in Paragraph “1” of the Complaint.
2. Denies each and every allegation contained in Paragraph “2” of the Complaint, except admits that Jeffrey Wu resides at 60 Overlook Road, Locust Valley, New York 11560.
3. Denies each and every allegation contained in Paragraph “3” of the Complaint, except admits that this adversary proceeding was commenced in the Chapter 11 case of Mr. Wu.
4. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “4” of the Complaint.

5. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "5" of the Complaint.

6. Denies each and every allegation contained in Paragraph "6" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

7. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "7" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

8. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "8" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

9. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "9" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

10. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "10" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

11. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "11" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

12. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "12" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

13. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "13" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

14. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "14" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

15. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "15" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

16. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "16" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

17. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "17" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

18. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "18" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

19. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "19" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

20. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "20" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

21. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "21" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

22. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "22" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

23. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "23" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

24. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "24" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

25. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "25" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

26. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "26" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

27. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "27" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

28. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "28" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

29. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "29" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

30. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "30" of the Complaint.

31. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "31" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

32. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "32" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

33. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "33" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

34. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "34" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

35. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "35" of the Complaint.

36. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "36" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

37. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "37" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

38. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "38" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

39. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "39" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

40. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "40" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

41. Denies each and every allegation contained in Paragraph "41" of the Complaint.

42. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "42" of the Complaint.

43. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "43" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

44. Denies each and every allegation contained in Paragraph "44" of the Complaint.

45. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "45" of the Complaint.

46. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "46" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

47. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "47" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

48. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "48" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

49. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "49" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

50. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "50" of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

51. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “51” of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

52. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “52” of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

53. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “53” of the Complaint and refers the interpretation of the referenced exhibit to the trier of fact.

54. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “54” of the Complaint.

55. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “55” of the Complaint.

56. Denies each and every allegation contained in Paragraph “56” of the Complaint.

57. Denies each and every allegation contained in Paragraph “57” of the Complaint.

58. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “58” of the Complaint.

59. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “59” of the Complaint.

60. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “60” of the Complaint.

61. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “61” of the Complaint.

62. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “62” of the Complaint.

63. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “63” of the Complaint.

64. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “64” of the Complaint.

65. Denies each and every allegation contained in Paragraph “65” of the Complaint.

66. Denies each and every allegation contained in Paragraph “66” of the Complaint.

67. Denies each and every allegation contained in Paragraph “67” of the Complaint.

68. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph “68” of the Complaint.

69. Denies each and every allegation contained in Paragraph “69” of the Complaint.

70. Denies each and every allegation contained in Paragraph “70” of the Complaint.

71. Denies each and every allegation contained in Paragraph “71” of the Complaint and refers the interpretation of the law to the Court.

72. Denies each and every allegation contained in Paragraph "72" of the Complaint.

73. Denies each and every allegation contained in Paragraph "73" of the Complaint.

74. Denies each and every allegation contained in Paragraph "74" of the Complaint.

75. Denies each and every allegation contained in Paragraph "75" of the Complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

76. The Plaintiff fails to state a claim upon which relief may be granted.

WHEREFORE, it is respectfully requested this Honorable Court grant judgment dismissing the Complaint, together with costs, disbursements and reasonable attorney's fees and such other and further relief as this court deems just and proper.

Dated: Garden City, New York
November 12, 2020

Weinberg, Gross & Pergament LLP
Attorneys for Debtor-Defendant

By: _____

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